

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Case No. 1:14-cv-00878

**DEFENDANT FIREFLY LEGAL, INC.'S  
MOTION TO DISMISS PLAINTIFFS' COMPLAINT**

1. Plaintiffs’ allegations of a purported conspiracy between Firefly and co-defendant JP Morgan Chase Bank NA (“Chase”) to violate Plaintiffs’ civil rights under 42 U.S.C. §§ 1983, 1985, and 1986 stem from a recently-concluded mortgage foreclosure case brought by Chase in the Circuit Court of Cook County, case number 11 CH 008260 (the “Foreclosure Case”).

3. Plaintiffs' Complaint also fails to allege state action as required under 42 U.S.C. § 1983.

4. Plaintiffs' allegation that Firefly and Chase "conspired together to violate one or more of plaintiff's civil rights" is merely a conclusion, unsupported by any factual allegations and is so implausible that it fails to provide sufficient notice to Firefly of Plaintiffs' claims. Compl. ¶10.

5. Plaintiffs' Complaint fails to allege a conspiracy with requisite specificity under 42 U.S.C. §§ 1983, 1985, and 1986.

Accordingly, for these reasons as well as those set forth in Firefly's accompanying Memorandum of Law, Firefly respectfully requests that this Court grant its motion and dismiss Plaintiff's Complaint with prejudice.

Respectfully submitted,

FIREFLY LEGAL, INC.

By: /s/ John M. Coleman  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 17, 2014, I electronically filed the foregoing with the Clerk of the Court using CM/ECF. I also certify that the foregoing is being served this day on all counsel of record identified below via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronic Notice of Electronic Filing:

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